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September 16, 2020

VIA ECF

Hon. Zahid N. Quraishi, U.S.M.J.
Clarkson S. Fisher Federal Building
and U.S. Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: *UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.*
Civil Action No. 19-17272 (MAS) (ZNQ)

Dear Judge Quraishi:

This firm, along with our co-counsel Stein Mitchell Beato & Missner LLP and Jenner & Block LLP, represents Plaintiffs in the referenced matter. I write regarding Plaintiffs' September 4, 2020 letter (ECF No. 90) and in reply to RCN's September 10, 2020 letter (ECF No. 94), addressing Defendant RCN's response to Plaintiffs' Interrogatory No. 4. In its letter, RCN now clearly admits that it has no information (whether based on documents or testimony) indicating that the company had a repeat infringer policy before June 2016. *See* RCN Ltr. at 1. In light of this concession—which Plaintiffs will ask RCN to confirm through one or more appropriate requests for admission—Plaintiffs no longer require the Court's intervention.

Respectfully yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

s/ Thomas R. Curtin

THOMAS R. CURTIN

cc: All counsel (via ECF and e-mail)